

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other
persons similarly situated, known and unknown,)

Plaintiff,)

v.)

STAFFING NETWORK HOLDINGS, LLC d/b/a)
STAFFING NETWORK and PHILIPS)
ELECTRONICS NORTH AMERICA)
CORPORATION, and PONTOON SOLUTIONS,)
INC.)

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**MOTION TO EXTEND DEADLINE TO FILE MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

Defendant Staffing Network Holdings, LLC d/b/a Staffing Network (“Staffing Network”), requests the Court extend the deadline, through and including February 13, 2015, for Plaintiff to file a Motion for Preliminary Approval of Settlement on Class-wide Basis. In support of this Motion, Staffing Network states as follows:

1. On November 6, 2014, the Parties reported to the Court that they had reached a class-wide settlement in this matter [ECF No. 97]. The Court set December 12, 2014 as the deadline by which Plaintiff would file her Motion for Preliminary Approval of the settlement reached by the Parties.

2. On December 12, 2014, the Parties filed a joint motion requesting additional time to finalize the written Settlement Agreement between them, because they had encountered disagreement over certain terms of the settlement. *See* ECF No. 101. The Parties resolved their disagreement and Plaintiff moved for additional time, through and including February 10, 2015, to file her Motion for Preliminary Approval of the settlement. The Court granted Plaintiff’s

motion and, accordingly, Plaintiff's Motion for Preliminary Approval of the settlement is currently due on February 10, 2015 [ECF No. 113].

3. The Parties have worked diligently to finalize the terms of the settlement. However, they need a short amount of additional time, through and until February 13, 2015, to finalize the settlement papers and for Plaintiff to file her Unopposed Motion for Preliminary Approval of Class-wide Settlement.

4. The undersigned counsel contacted counsel for all Parties. Neither Plaintiff, nor Defendant Pontoon Solutions, Inc., opposes this Motion. The undersigned counsel could not reach counsel for Defendant Philips Electronics North America Corporation and, therefore, does not file this motion as unopposed.

WHEREFORE, Staffing Network requests that the Court grant an extension, through and including February 13, 2015, for Plaintiff to file her Unopposed Motion for Preliminary Approval of Class-wide Settlement.

DATED: February 10, 2015

Respectfully submitted,

STAFFING NETWORK HOLDINGS, LLC
d/b/a STAFFING NETWORK

By: /s/ Laura E. Reasons
One of Its Attorneys

Gerald L. Maatman
Rebecca DeGroff
Giselle Perez de Donado
Matthew Gagnon
Natascha B. Riesco
Laura E. Reasons
Kara L. Goodwin
SEYFARTH SHAW LLP
131 South Dearborn Street, Suite 2400
Chicago, Illinois 60603
Telephone: (312) 460-5000
Facsimile: (312) 460-7000

*Attorneys for Defendant Staffing Network
Holding, LLC d/b/a Staffing Network*

CERTIFICATE OF SERVICE

Laura E. Reasons, an attorney, hereby certifies that on February 10, 2015, she caused a true and correct copy of the foregoing to be served via the Court's electronic filing system on all attorneys of record in this matter:

s/ Laura E. Reasons

Laura E. Reasons